

IN THE CHANCERY COURT FOR LEWIS COUNTY
AT HOHENWALD, TENNESSEE

In re:

SENTINEL TRUST COMPANY

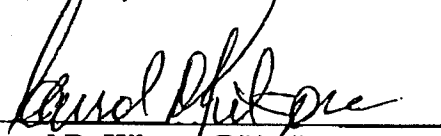
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No. 4781

Motion for Stay of Final Judgments Entered April 12, 2006
and Supporting Oaths

Pursuant to Rule 62, T.R.Civ.P., and Rule 18, T.R.App.P., Respondents Sentinel Trust Company, Danny N. Bates, and Respondent-Directors Clifton T. Bates, Howard H. Cochran, and Gary L. O'Brien respectfully move the Court to stay the enforcement of the aforementioned judgments pending disposition of the Respondents' appeals thereof, that such stay be granted without any requirement of bond for costs on the basis of the affidavits of poverty below, and that the Court rule upon this motion without requiring oral argument.

Respectfully submitted,

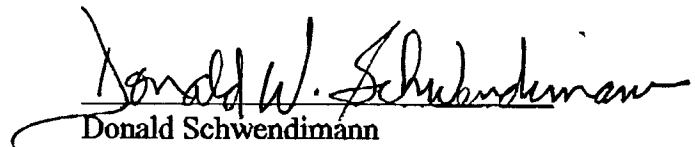


Carrol D. Kilgore (BPR #2544)
Attorney for Objecting Parties
95 White Bridge Road
Cavalier Bldg., Suite 509
Nashville, TN 37205-1427
(615) 356-7677

FILED
AT 12:01 O'CLOCK P. M.

MAY 03 2006

JANET WILLIAMS, CLERK & MASTER
BY Selena Wix



Donald Schwendimann
Local Co-Counsel
306 W. Main Street
P.O. Box 366
Hohenwald, TN 38462
931-796-1147

STATE of TENNESSEE)
)
COUNTY of LEWIS)

Personally appeared before me, a Notary Public for the above State and County, the undersigned Danny N. Bates, in his capacities as Controlling Stockholder, President, and Chairman of the Board of Directors of Sentinel Trust Company, who, after being duly sworn according to law, deposed and said:

1. The office building of Sentinel Trust Company in Hohenwald, Tennessee, was constructed at a cost of approximately \$1 million, and through my ownership of almost all the stock in said corporation, was indirectly my property; and the contents that are the property of Sentinel Trust Company are also indirectly my property due to my ownership of controlling stock in the said corporation; and I hold no property of value adequate to cover the hundreds of thousands of dollars involved in the appeal from the judgments Sentinel Trust Company and I are appealing. My home, which I had given to my wife, has been subjected by the Tennessee Department of Financial Institutions to a lien which makes it impossible for me to seek a loan from my wife through the use of said property as security. Further, some items of property within the said building are not the property of Sentinel Trust Company.

2. Hence, due to my poverty and that of the corporation of which I am the controlling stockholder, Sentinel Trust Company, I, Danny N. Bates, do solemnly swear that each of us is unable to bear the expenses of the appeal we are about to commence, and that the said corporation and I are justly entitled to the relief to be sought in said appeal, to the best of my belief and the belief of the said corporation.

3. Part of our belief in the justice of our cause—aside from the fact that the legal basis of our denial that the Commissioner is vested with the powers claimed and exercised by him, which

